

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC-JSC

**STIPULATION AND [PROPOSED]  
ORDER REGARDING DISCOVERY  
MEDIATOR**

By and through their undersigned counsel, the parties hereby stipulate and agree as follows:

1. Whereas, on March 4, 2021, the Court ordered the parties to “hire a discovery mediator.” Trans. of 3/4/2021 Hearing at 14:5-12; *see also* Dkt. 632.
2. Whereas, the Court ordered the parties to “inform the Court of their selection of a discovery mediator” by March 11, 2021, *see* Dkt. 632, and subsequently extended that deadline via email until March 16, 2021.
3. Whereas, the parties met and conferred and agreed to retain the Honorable Gail Andler (Retired) of JAMS as a discovery mediator.
4. Whereas, on March 16, 2021, Facebook reported the parties’ agreement to retain Judge Andler as a discovery mediator to the Court via email.

**THE PARTIES THEREFORE STIPULATE AND AGREE AS FOLLOWS:**

1. The parties agree to retain the Honorable Gail Andler (Retired) of JAMS to serve as a discovery mediator in this action consistent with the Court’s instructions at the March 4, 2021 discovery conference.

Dated: March 20, 2021

**KELLER ROHRBACK LLP**

By: /s/ Derek W. Loeser  
Derek W. Loeser

Derek W. Loeser (*admitted pro hac vice*)  
Lynn Lincoln Sarko (*admitted pro hac vice*)  
Gretchen Freeman Cappio (*admitted pro hac vice*)  
Cari Campen Laufenberg (*admitted pro hac vice*)  
David J. Ko (*admitted pro hac vice*)  
Benjamin Gould (SBN 250630)  
Adele Daniel (*admitted pro hac vice*)  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101

Respectfully submitted,

**BLEICHMAR FONTI & AULD LLP**

By: /s/ Lesley E. Weaver  
Lesley E. Weaver

Lesley E. Weaver (SBN 191305)  
Anne K. Davis (SBN 267909)  
Joshua D. Samra (SBN 313050)  
Matthew P. Montgomery (SBN 180196)  
Angelica M. Ornelas (SBN 285929)  
555 12th Street, Suite 1600  
Oakland, CA 94607  
Tel.: (415) 445-4003  
Fax: (415) 445-4020  
lweaver@bfalaw.com  
adavis@bfalaw.com

Tel.: (206) 623-1900  
Fax: (206) 623-3384  
[dloeser@kellerrohrback.com](mailto:dloeser@kellerrohrback.com)  
[lsarko@kellerrohrback.com](mailto:lsarko@kellerrohrback.com)  
[gcappio@kellerrohrback.com](mailto:gcappio@kellerrohrback.com)  
[claufenberg@kellerrohrback.com](mailto:claufenberg@kellerrohrback.com)  
[dko@kellerrohrback.com](mailto:dko@kellerrohrback.com)  
[bgould@kellerrohrback.com](mailto:bgould@kellerrohrback.com)  
[adaniel@kellerrohrback.com](mailto:adaniel@kellerrohrback.com)

Christopher Springer (SBN 291180)  
801 Garden Street, Suite 301  
Santa Barbara, CA 93101  
Tel.: (805) 456-1496  
Fax: (805) 456-1497  
[cspringer@kellerrohrback.com](mailto:cspringer@kellerrohrback.com)

*Co-Lead Counsel for Plaintiffs*

DATED: March 20, 2021

Deborah Stein (SBN 224570)  
[dstein@gibsondunn.com](mailto:dstein@gibsondunn.com)  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

Kristin A. Linsley (SBN 154148)  
[klinsley@gibsondunn.com](mailto:klinsley@gibsondunn.com)  
Martie Kutscher (SBN 302650)  
[mkutscherclark@gibsondunn.com](mailto:mkutscherclark@gibsondunn.com)  
GIBSON, DUNN & CRUTCHER LLP  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

*Attorneys for Defendant Facebook, Inc.*

[jsamra@bfalaw.com](mailto:jsamra@bfalaw.com)  
[mmontgomery@bfalaw.com](mailto:mmontgomery@bfalaw.com)  
[aornelas@bfalaw.com](mailto:aornelas@bfalaw.com)

Respectfully submitted,

**GIBSON, DUNN & CRUTCHER, LLP**

By: /s/ Orin Snyder  
Orin Snyder (*pro hac vice*)  
[osnyder@gibsondunn.com](mailto:osnyder@gibsondunn.com)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166-0193  
Telephone: 212.351.4000  
Facsimile: 212.351.4035

Joshua S. Lipshutz (SBN 242557)  
[jlipshutz@gibsondunn.com](mailto:jlipshutz@gibsondunn.com)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATE: March 22, 2021



United States Magistrate Judge Jacqueline Corley